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October 14, 2020

VIA ECF

Counsel's request to file the relevant exhibit in redacted form due to the inclusion of confidential financial and personal identifying information (dkt. no. 274) is granted. SO ORDERED.

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

10/15/2020

Re: *Peterson, et al. v. Islamic Republic of Iran, et al.*, No. 13-cv-9195 (LAP)

Dear Judge Preska:

We are co-counsel to the Plaintiffs and write to request permission to file under seal Exhibit 99 to the Declaration of Liviu Vogel that was filed on October 13, 2020 in opposition to the Motion of Banca UBAE S.p.A. to Dismiss the Complaint. The subject exhibit was filed in redacted form on October 13, 2020 as ECF No. 272-4.

Consistent with Defendants' redactions to 26 of the exhibits annexed to my August 12, 2020 declaration, Exhibit 99 has been redacted solely to withhold from publication third-party financial information and personal identifying information that Defendants have designated confidential pursuant to various protective orders entered in *Peterson v. Islamic Republic of Iran*, S.D.N.Y. Case No. 10-cv-4518 (copies of which were annexed to Plaintiffs' August 28, 2020 sealing motion (ECF No. 234)). Defendants contend that the personal identifying information is potentially subject to foreign privacy laws.

Redacted and un-redacted copies of Exhibit 99 will be submitted for Your Honor's review via an email to PreskaNYSDChambers@nysd.uscourts.gov.

Respectfully submitted,

/s/ Liviu Vogel

CC: All counsel (via ECF)